

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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MICHELLE TENZER-FUCHS, on behalf
of herself and other similarly situated

Case No.: 2:20-cv-03706

Plaintiff,

v.

ANGEL BRINKS FASHION, INC.

Defendant.
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**DECLARATION OF GREGORY H. GRIFFITH IN SUPPORT OF DEFENDANT'S
MOTION TO DISMISS**

GREGORY H. GRIFFITH, pursuant to 28 U.S.C. § 1746, declares under the penalty of perjury, as follows:

1. I am an attorney for the Defendant in this action and submit this declaration in support of Defendant's motion to dismiss.

2. Annexed hereto as 'Compl.' is a true and correct copy of the Complaint electronically filed in this action on August 14, 2020.

3. Annexed hereto as 'Exhibit A' is a true and correct copy of the forty-four cases filed by Plaintiff and her attorney in the Eastern District.

4. Annexed hereto as 'Exhibit B' is a true and correct copy of all cases filed in the federal courts in New York by Plaintiff's counsel.

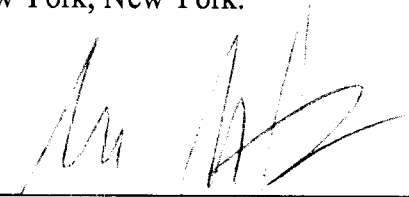
5. Annexed hereto as 'Exhibit C' is a true and correct copy of a partial printout from Defendant's website of bathing suits available for purchase.

6. Annexed hereto as Exhibit D is a true and correct copy of the Facebook page for Angel Brinks Fashion, Inc.

7. Annexed hereto as Exhibit E is a true and correct copy of the 'contact us' page from www.angelbrinks.com.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 14, 2021, in New York, New York.



GREGORY H. GRIFFITH